## IN THE UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

|                            | X |                       |
|----------------------------|---|-----------------------|
|                            | : | Chapter 9             |
| In re                      | : |                       |
|                            | : | Case No. 13-53846     |
| CITY OF DETROIT, MICHIGAN, | : |                       |
|                            | : | Hon. Thomas J. Tucker |
| Debtor                     | : |                       |
|                            | X |                       |

## STIPULATION FOR WITHDRAWAL OF CLAIM OF TECH TOWN

The Wayne State University Research and Technology Park a/k/a Tech Town ("Tech Town" or "Claimant") and the City of Detroit, Michigan (the "City"), by and through the undersigned, stipulate as follows in support of the entry of the *Order Withdrawing Claim of Tech Town* attached hereto as **Exhibit 1.** 

- 1. On December 17, 2013, Tech Town filed its proof of claim, Claim No. 282 (the "Claim") in the amount of \$966,472.00.
  - 2. The Claim is alleged to be a general unsecured claim.
  - 3. Claimant stipulates that the City owes no pre-petition amounts to Claimant.
- 4. Tech Town hereby withdraws the Claim in its entirety because its claim is not against the City, but Tech Town reserves its rights to seek and obtain recovery from parties other than the City.
  - 5. Tech Town covenants not to assert the Claim against the City.
- 6. Nothing in this Stipulation or the proposed order attached hereto as Exhibit 1 addresses any post-petition or post-confirmation claims which have arisen or may arise between

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the City and Tech Town. Both parties fully reserve all of their respective rights with respect to any post-petition or post-confirmation claims.

WHEREFORE the parties respectfully request that the Court enter an order in the form attached hereto as Exhibit 1 withdrawing the Claim.

Respectfully submitted by:

Honigman Miller Schwartz and Cohn LLP

Foley & Lardner, LLP

By: /s/ Judy B. Calton (with consent)
Judy B. Calton (P38733)

660 Woodward Avenue Suite 2290

Detroit, MI 48226 Phone: (313) 465-7344 jcalton@honigman.com

Counsel to the Wayne State University Research and Technology Park

Dated: March 19, 2015

a/k/a Tech Town

By: <u>/s/ Jeffrey S. Kopp</u>

Jeffrey S. Kopp (P59485)

John A. Simon (P61866)

Andrew B. Fromm (P79185) 500 Woodward Ave., Ste. 2700

Detroit, MI 48226 Phone: (313) 234-7100

jkopp@foley.com jsimon@foley.com afromm@foley.com

Counsel to the City of Detroit, Michigan

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